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Casanova/R6/USEPA/US  
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To Gary Moore/R6/USEPA/US@EPA  
cc Gloria-Small Moran/R6/USEPA/US@EPA  
bcc  
Subject Comments on NORCO's Pipeline Report

Gary, following are my comments on NORCO's pipeline report:

1. The map of the inactive and active pipelines is very confusing, not easy to read.
2. It is unclear from the report on how the abandoned pipelines were cleaned out, were they flushed or just pigged.
3. The attached .pdf file shows the pipelines to the east of Sunray Road that you and I witnessed. The vehicles to the left are at the same location where they performed the pipeline cutoff west of Sunray. The pipelines shown on the attached .pdf file are not addressed in the report. Note the images in their report that shows these same lines to the west of Sunray Road. The report also does not address how the lines to the east of Sunray were cleaned. Were they flushed, pigged, or neither. From my conversation with them while I was at the Site, they informed me that gravity flow would suffice. I don't think gravity flow would address the pipelines to the east of Sunray. They are assuming a low spot to the west of Sunray which may not be the case. Also, their map shows a pipeline leading to their docking facility. Is this the correct location of that line, and how was that line flushed, cleaned.
4. During my Site visit while they were performing the work, TCEQ and I noticed several hydrocarbon seepages near the same locations shown on the attached .pdf. I have images if you need them. NORCO continues to disregard these pipelines. Are they denying ownership to the east of Sunray and accepting ownership to the west of Sunray?



Pages from falcon\_attachment\_a.pdf

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Assigned Sites for Investigation and Remediation (<http://www.epa.gov/earth1r6/6sf/6sf-tx.htm>):  
Brine Service Company Superfund Site (Corpus Christi, Texas)  
Falcon Refinery Superfund Site (Ingleside, Texas)  
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)



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